

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA,

Plaintiff,

No. 8-CV-50008

VS.

YOUNG CONSTRUCTION & PAVING, LLC; KAREN B. YOUNG; GORDON T. YOUNG; JEFFREY D. YOUNG; MONICA L. YOUNG; JOSEPH WELLS; TERRI WELLS; LUKE D. VANDER BLEEK; and JOAN L. VANDER BLEEK,

Defendants.

and

JOSEPH WELLS; TERRI WELLS; LUKE D. VANDER BLEEK; and JOAN L. VANDER BLEEK,

Counter-Plaintiffs/Third-Party Plaintiffs,

VS.

TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA,

Counter-Defendant,

and

TRISSEL, GRAHAM AND TOOLE, INC., a corporation,
DANIEL CURRAN, and ROGER A. COLMARK,

Third-Party Defendants.

NOTICE OF MOTION

To: Attorneys of Record
Roger A. Colmark


PLEASE TAKE NOTICE that on Wednesday, July 23, 2008, at 1:30 p.m., or as soon thereafter as this Motion may be heard, I shall appear before Honorable Judge Mahoney or

any Judge sitting in his stead, presiding in United States District Court, Northern District of Illinois, Western Division, 211 South Court Street, Rockford, Illinois and then and there present for hearing Motion for Leave to File an Amended Counterclaim, a copy of which is attached hereto.

Dated: July 21, 2008.

JOSEPH WELLS; TERRI WELLS; LUKE D.
VANDER BLEEK; and JOAN L. VANDER
BLEEK

By: RENO & ZAHM LLP

By: 
Robert A. Fredrickson

RENO & ZAHM LLP

BY: ROBERT A. FREDRICKSON, #00868469

JACK D. WARD, #3125783

MICHAEL J. SCHIRGER, #6290691

2902 McFarland Road

Perry Creek Plaza, Suite 400

Rockford, IL 61107

(815) 987-4050

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document was served upon the following:

Atty. James M. Allen
Hinshaw & Culbertson, LLP
100 Park Avenue
P.O. Box 1389
Rockford, IL 61105
Fax No. 815-490-4901

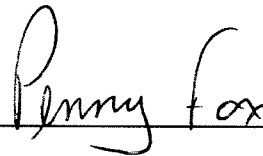
Atty. Anthony J. Tunney
Hepler, Broom, MacDonald, Hebrank,
True & Noce, LLC
150 N. Wacker Dr., Suite 3100
Chicago, IL 60606
Fax No. 312-230-9201

Atty. John E. Sebastian
Atty. Albert L. Chollet, III
Hinshaw & Culbertson, LLP
222 N. LaSalle St., Suite 300
Chicago, IL 60601
Fax No. 312-704-3001

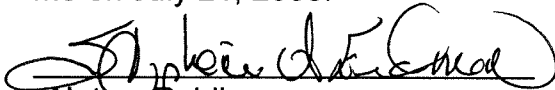
Atty. Steven Balsley
Barrick, Switzer, Long, Balsley & Van Evera
6833 Stalter Drive
Rockford, IL 61108
Fax No. 815-962-0687

Mr. Roger Colmark
210 E. 3rd Street
Sterling, IL 61081
Fax No. 815-626-9268

by facsimile transmission to the above fax numbers, at Rockford, Illinois on July 21, 2008.



Subscribed and sworn to before
me on July 21, 2008.


Notary Public



ROBERT A. FREDRICKSON, #412
Reno & Zahm LLP
2902 McFarland Road, Suite 400
Rockford, IL 61107
815/987-4050